



State of Vermont

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September 25, 2001

Mr. Bruce Ralston
c/o Yankee Builders, Inc.
P.O. Box 331 ^{W5816}
St. Johnsbury, Vermont ⁰⁵¹⁵⁶

RE: Petroleum Contamination at the Ralston Mill, St. Johnsbury, Vermont (SMS Site # 95-1844)

Dear Mr. Ralston:

As the result of a recent activities, the Sites Management Section (SMS) has reviewed the Underground Storage Tank (UST) closure report for the above referenced site. The fieldwork was conducted by Dubois & King, Inc., on July 27, 1995. The report (text enclosed) is dated August 1, 1995 and summarizes the degree and extent of contamination encountered during closure of an out-of-service 2,000 gallon gasoline underground storage tank (UST).

During site activities, screened soils had concentrations of 180 parts per million (ppm) as measured by a photoionization detector (PID). A peak PID reading of 180 ppm was measured at a depth of approximately 5.0 feet below ground surface (fbgs) under the dispenser. A one-half inch diameter hole was discovered in the tank. All excavated soils were backfilled at the conclusion of the UST removal program. The limits of soil contamination were not defined.

Groundwater was encountered at a depth of approximately 8.0 feet below grade. A soil sample from below the water table had PID readings of 50 to 80 ppm. No bedrock was encountered in the excavation.

Site soils exhibited evidence of a petroleum release. Soils above the seasonal high water table were brown medium sands, while soils below the contamination zone were medium grey sands. Soils beneath the water table contained pebbles and small cobbles.

It was reported that this site would be investigated under the expressway program. A site investigation expressway notification form sent to the SMS estimated a report date of October 15, 1995. The SMS expected to receive the expressway investigation report within 60 days of the receipt of the form. As of this date, the SMS has not received the site investigation report. Due to the possible contamination to nearby receptors the SMS requests a copy of the investigation report; or that the Ralston Mill retain the services of a qualified consultant to perform the following:

- ☐ Further define the degree and extent of contamination to the soil.
- ☐ If appropriate, determine if the airspace beneath the site and site adjacent building(s) (e.g. basements) has been impacted by the release using a PID. Wall and floor construction and susceptibility to vapor migration should be noted. PID measurements should be made in cracks and/or joints likely impacted. If the airspace has been impacted, SMS requests confirmatory sampling and laboratory analyses be performed using EPA Method TO-2.
- ☐ Determine the degree and extent of contamination, if any, to groundwater. A sufficient number of monitoring sites should be installed to adequately define the severity of site contamination. Analyze groundwater samples for Volatile Organic Compounds (VOCs) using EPA Method 8021B and Total Petroleum Hydrocarbons (TPH) using EPA Method 8015. At sites proximal to water supply sources, determine the hydrologic relationship of the contaminated area to the water supply source. Pumping influences should be considered in the evaluation.

- ☐ Assess the potential for contaminant impact on sensitive receptors. Base this update on all available information and include basements of adjacent buildings, nearby surface water, any proximal drinking water sources, wetlands, sensitive ecologic areas, outdoor or indoor air, sewers, or utility corridors. Sample and analyze any at-risk water supplies for BTEX, TPH and MTBE compounds.
- ☐ Determine the need for long-term treatment and/or monitoring that addresses groundwater contamination.
- ☐ Submit a summary report that outlines the work performed, as well as provides conclusions and recommendations. **As appropriate** include analytical data; a site map showing the location of any potential sensitive receptors, stockpiled soils and monitoring or sample locations; an area map; detailed well logs; and a groundwater contour map.
- ☐ With the work plan, please submit a site location map at an approximate scale of 1:24000 showing the location of the site. Please include a scale, a north arrow, the SMS site number, and a citation of the source map. The purpose of this map is to enable the SMS to enter the site location into a Geographical Information Systems database.

Please have your consultant submit a preliminary work plan and cost estimate within fifteen days of your receipt of this letter, so it may be approved prior to the initiation of onsite work. Enclosed please find a list of consultants who perform this type of work as well as the brochure "*Selecting Your UST Cleanup Contractor*," which will help you in choosing an environmental consultant.

Based on current information, the underground storage tank at the Ralston Mill is eligible for participation in the Petroleum Cleanup Fund (PCF). You must provide written proof to the SMS that you hold no other applicable insurance in order to receive reimbursement from the PCF. The owner or permittee must pay for the removal and/or repair of the failed tank(s), and for the initial \$10,00.00 of the cleanup. The fund will reimburse the tank owner or permittee for additional eligible cleanup costs of up to \$1 million. All expenditures must be pre-approved by the Agency or performed in accordance with the "*Site Investigation Guidance*" expressway program. Please refer to the enclosed guidance document titled, "*Procedures for Reimbursement from the Petroleum Cleanup Fund*" for additional information concerning the PCF.

The Secretary of the Agency of Natural Resources reserves the right to seek cost recovery of fund monies spent at the Ralston Mill, if the Secretary concludes that the Ralston Mill is in significant violation of the Vermont Underground Storage Tank Regulations or the Underground Storage Tank statute (10 V.S.A., Chapter 59). **Please be aware that failure to conduct a proper site investigation is a violation of 10 V. S.A. § 6615, corrective action procedures.**

We are here to help make this process as effective and uncomplicated as possible. Please review the enclosed documents and call me with any questions you may have. I can be reached at (802) 241-3731.

Sincerely,

Bill Roberts

Bill Roberts,
Sites Management Section

Enclosures (3)

cc: St. Johnsbury Select Board w/o enclosure
St. Johnsbury Health Officer w/o enclosure
DEC Regional Office w/o enclosure
Robert Nichols, Dubois & King, Inc. w/o enclosure